

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, DC 20554

In the Matter of	)	
	)	
Expanding the Economic and Innovation	)	<b>GN Docket No. 12-268</b>
Opportunities of Spectrum through Incentive	)	
Auctions	)	

To: The Commission (Electronically Filed)

**COMMENTS OF WATCHTV, INC.**  
**SUPPORTING PETITION FOR RECONSIDERATION**

1. WatchTV, Inc. (“WatchTV”) hereby submits these Comments in support of the Petition for Reconsideration filed in this proceeding on September 2, 2015, by The Videohouse, Inc., Abacus Television, WMTM, LLC, and KMYZ, LLC.<sup>1</sup> WatchTV is the licensee of seven Class A Television Stations, all of which it plans to offer for sale in the Incentive Auction, so it has a significant stake in this proceeding.

2. The Incentive Auction is an extraordinarily innovative procedure which WatchTV has repeatedly supported in both written Comments and several personal visits to the Commission’s offices in Washington. The Commission has repeatedly emphasized, and WatchTV agrees, that the auction project is very complicated, and every effort must be made to keep the ultimate goal in focus and the proceedings on track toward timely achievement of that goal.

3. The petitioners request relief for stations that have worked hard to achieve Class A status and have provided Class A-quality service to the public for a decade and a half. Their efforts to achieve final Class A status were repeatedly frustrated, and they have now been trapped by a deadline that the Commission has openly agreed that it has the power to adjust or waive, as it has already done for KHTV-CD. There are only four of these stations. Making so small an additional number eligible for the auction will not have a significant impact on the Commission’s ability to

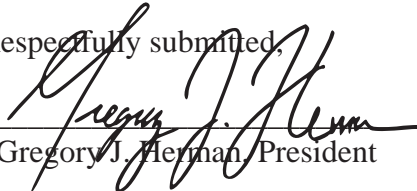
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<sup>1</sup> Notice of the Petitions for Reconsideration was given by Public Notice of September 21, 2015, Report No. 3028.

repurpose TV spectrum, especially if the stations are offered for sale in the auction. The plight of these stations should not be permitted to become a distraction from the auction effort. The Commission should grant them relief, based both on the merits of their cases and the importance of avoiding the risk of potential litigation that could disrupt the auction timetable.

4. This matter should be put to rest promptly, and these deserving stations should be granted the relief they seek.

Respectfully submitted,



Gregory J. Herman, President

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October 2, 2015

Resubmitted November 30, 2015

**CERTIFICATE OF SERVICE**

I, Evelyn M. Ojea, an Assistant with the office of Fletcher, Heald & Hildreth PLC, hereby certify that I caused true and correct copies of the foregoing "Comments of WatchTV, Inc. Supporting Petition for Reconsideration" to be sent on this 2<sup>nd</sup> day of October, 2015, via First Class United States mail, postage pre-paid, to the following:

THE VIDEOHOUSE, INC.  
Ronald J. Bruno, President  
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Pittsburgh, PA 15220

ABACUS TELEVISION  
Benjamin Perez, Owner  
514 Chautauqua Street  
Pittsburgh, PA 15214

WMTM, LLC  
Lawrence Rogow, Member  
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KMYA, LLC  
Larry E. Morton, Co-President  
#1 Shackleford Drive  
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Evelyn M. Ojea